

RE: ***H R O, INC. 087-14534-00051***  
TO: Interested Parties / Applicant

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision - Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

*(over)*

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
Administrator, Christine Todd Whitman  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

FNTVOP.WPD  
8-21-02



Governor

Lori F. Kaplan  
Commissioner

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*to make Indiana a cleaner, healthier place to live.*

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-

6015

(317) 232-8603  
(800) 451-6027  
[www.state.in.us/idem](http://www.state.in.us/idem)

## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**H.R.O., Inc.  
200 E. Vine Street,  
Wolcottville, IN 46795**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T087-14534-00051	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 31, 2003  Expiration Date: January 31, 2008

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a fiberglass manufacturing plant that produces boat and cargo trailer components.

Responsible Official:	President, H.R.O., Inc.
Source Address:	200 E. Vine Street, Wolcottville, IN 46795
Mailing Address:	P.O. Box 315, Wolcottville, IN 46795
Source Phone Number:	(219) 854-2772
SIC Code:	3732
County Location:	LaGrange
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act Not 1 of 28 source categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) resin flowcoat booths, identified as FC1S and FC2N, constructed in 1998, using non-atomized resin application, with a maximum production rate of 7.5 and 4.0 parts/hr, respectively, and sources of fugitive emissions.
- (b) Two (2) gelcoat booths, identified as SB1E, and SB2W, constructed in 1998, using non-atomized gelcoat application, with a maximum production rate of 7.5 and 4.0 parts/hr, respectively, with emissions exhausted to stacks SV1E and SV2W, respectively.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to maintenance activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).



## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office Telephone Number 219-245-4870

Northern Regional Office Facsimile Number 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source,

except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015



Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-

20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously



submitted a request for a minor permit modification to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]**

---

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

### **Part 2 MACT Application Submittal Requirement**

#### **C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e) and 326 IAC 2-7-12]**

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- (a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).
- (b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:
  - (1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;
  - (2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or
  - (3) The MACT standard or standards for the affected source categories included at the source are promulgated.
- (c) Notwithstanding paragraph (a), the Permittee shall comply with an applicable promulgated MACT standard, including the initial notification requirements of the MACT standard, in accordance with the schedule provided in the MACT standard, if the MACT standard is promulgated prior to the Part 2 MACT Application deadline. If a MACT has been promulgated and the source is subject to the MACT, the Permittee shall submit an

application for a significant permit modification under 326 IAC 2-7-12 no later than nine (9) months prior to the compliance date for the MACT. The application should include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed. If a permit renewal application is due before the date that a significant permit modification application would be due, the Permittee shall include the required information in the renewal application in lieu of submitting an application for a significant permit modification.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Fiberglass Parts Manufacturing Operation:

- (a) Two (2) resin flowcoat booths, identified as FC1S and FC2N, constructed in 1998, using non-atomized resin application, with a maximum production rate of 7.5 and 4.0 parts/hr, respectively, and sources of fugitive emissions.
- (b) Two (2) gelcoat booths, identified as SB1E, and SB2W, constructed in 1998, using non-atomized gelcoat application, with a maximum production rate of 7.5 and 4.0 parts/hr, respectively, with emissions exhausted to stacks SV1E and SV2W, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 New Source Toxics Control [326 IAC 2-4.1] [326 IAC 20-25]

Pursuant to the MACT (Maximum Available Control Technology) determination under 326 IAC 2-4.1-1, and in order to comply with the applicable requirements of 326 IAC 20-25, operating conditions for the fiberglass operations (booths FC1S, FC2N, SB1E and SB2W) shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application of Fiber Reinforced Plastic Composites (non-watercraft)	
Production-Specialty Products	48*
Gel Coat Application of Fiber Reinforced Plastic Composites (non-watercraft)	
Production-Pigmented	37
Resin, Manual or Mechanical Application of Fiber Reinforced Plastic Composites (watercraft)	
Production-Specialty Products	48*
Gel Coat Application of Fiber Reinforced Plastic Composites (watercraft)	
Production-Pigmented	34

\* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.9 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection (b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

$M_R$  = Total monthly mass of material within each category.

$E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.

$Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls.

*Units: mass = tons*

*emission factor = lbs of monomer per ton of resin or gel coat*

*emissions = lbs of monomer*

- (c) The following categories of materials in subsection (b) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).
- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).

- (e) The listed work practices shall be followed:
  - (1) Cleaning operations for resin and gel coat application equipment:
    - (A) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment. To the extent possible the cleaning solvent used shall also be a non-VOC solvent.
    - (B) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
    - (C) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
  - (2) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
  - (3) Except for mixing containers as described in item (8), HAP and VOC containing materials shall be kept in a closed container when not in use.
  - (4) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
  - (5) Solvent collection containers shall be kept closed when not in use.
  - (6) Clean-up rags with solvent shall be stored in closed containers.
  - (7) Closed containers shall be used for the storage of the following:
    - (A) All production and tooling resins that contain HAPs.
    - (B) All production and tooling gel coats that contain HAPs.
    - (C) Waste resins and gel coats that contain HAPs.
    - (D) Cleaning materials, including waste cleaning materials.
    - (E) Other materials that contain HAPs.
  - (8) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (f) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:



- (1) All personnel hired after the effective date of this rule shall be trained within fifteen (15) days of hiring.
- (2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule.
- (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (4) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (2) if written documentation that the employee's training is current is provided to the new employer.
- (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

- (1) Appropriate application techniques.
- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Gelcoat Booths (SB1E and SB2W) are subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), the VOC/HAP emissions from resin and gel use from the fiberglass operations shall be limited to less than 100 tons per twelve consecutive month period.

Compliance with the requirements of 326 IAC 2-4.1 has been determined to satisfy the requirements of 326 IAC 8-1-6 (BACT).

#### D.1.3 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the fiberglass operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

### **Compliance Determination Requirements**

#### **D.1.5 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)**

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Compliance with the VOC usage and HAP monomer content limitations in Condition D.1.1 shall be determined by one of the following:

- (1) The manufacturer's certified product data sheet.
- (2) The manufacturer's material safety data sheet.
- (3) Sampling and analysis, using any of the following test methods, as applicable:
  - (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998)\*, shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
  - (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998)\*, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (4) An alternate method approved by IDEM, OAQ.

## **Compliance Monitoring Requirements**

### **D.1.6 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate from the fiberglass operations shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

### **D.1.7 Monitoring**

- 
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SV1E and SV2W while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements**

### **D.1.8 Record Keeping Requirements**

- 
- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5)

shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic compound and volatile HAP emission limits established in Conditions D.1.1 and D.1.2.

- (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets (CPDS), and calculations necessary to verify the type, amount used, VOC and HAP content of each resin or gel coat;
  - (2) A log of the dates of use;
  - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (4) The calculated total volatile organic HAP emissions from resin and gel coat use for each month; and
  - (5) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.1(f), the Permittee shall maintain the following training records:
- (1) A copy of the current training program.
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities

- (a) The following equipment related to maintenance activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(e)]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2(e)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)]

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Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the brazing soldering, welding, grinding, and machining operations shall not exceed 0.551 pounds per hour when operating at a process weight of less than one hundred (100) pounds per hour.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: H.R.O., Inc.  
Source Address: 200 E. Vine Street, Wolcottville, IN 46795  
Mailing Address: P.O. Box 315, Wolcottville, IN 46795  
Part 70 Permit No.: T087-14534-00051

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Affidavit (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE BRANCH**  
**100 North Senate Avenue**  
**P.O. Box 6015**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: H.R.O., Inc.  
Source Address: 200 E. Vine Street, Wolcottville, IN 46795  
Mailing Address: P.O. Box 315, Wolcottville, IN 46795  
Part 70 Permit No.: T087-14534-00051

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - ☐ The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:



If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: H.R.O., Inc.  
Source Address: 200 E. Vine Street, Wolcottville, IN 46795  
Mailing Address: P.O. Box 315, Wolcottville, IN 46795  
Part 70 Permit No.: T087-14534-00051  
Facility: Flowcoat and Gelcoat Booths (FC1S, FC2N, SB1E and SB2W)  
Parameter: Usage of all gelcoats and resins  
Limit: Such that the potential to emit (PTE) volatile organic HAP from resins and gel coats shall be less than 100 tons per twelve (12) consecutive months.

The potential HAP emissions should be calculated with the following formula:

Potential HAP (tpy) = resin (gelcoat) use rate (ton/hr) \* UEF (lb HAP per ton resin or gelcoat used) \* 8760 (hr/yr) \* .005 (ton/lb)

by using the appropriate UEF (Unified Emission Factors) for Open Molding of Composites:

Facility	FC1S*	FC2N*	SB1E*	SB2W*
UEF(lb Styrene/ton)	71	71	278	278
UEF(lb MMA/ton)	-	-	60	60

\* These UEFs are for an average resin Styrene content of 33% and average gelcoat Styrene content of 31.27%. These UEFs are for an average gelcoat Methyl Methacrylate (MMA) content of 4%. If the average HAP content of the resin and gelcoats applied changes, the appropriate UEF factors should be used.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: H.R.O., Inc.  
Source Address: 200 E. Vine Street, Wolcottville, IN 46795  
Mailing Address: P.O. Box 315, Wolcottville, IN 46795  
Part 70 Permit No.: T087-14534-00051

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**January 31, 2003**  
**Indiana Department of Environmental Management**  
**Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Operating Permit**

**Source Background and Description**

Source Name:	H.R.O., Inc.
Source Location:	200 E. Vine Street, Wolcottville, Indiana 46795
County:	LaGrange
SIC Code:	3732
Operation Permit No.:	T087-14534-00051
Permit Reviewer:	ERG/BS

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from H.R.O., Inc. relating to the operation of a fiberglass manufacturing plant that produces boat and cargo trailer components.

**Permitted Emission Units and Pollution Control Equipment**

There are no permitted facilities operating at this source during this review process.

**Unpermitted Emission Units and Pollution Control Equipment**

This stationary source consists of the following unpermitted emission units and pollution control devices:

- (a) Two (2) resin flowcoat booths, identified as FC1S and FC2N, constructed in 1998, using non-atomized resin application, with a maximum production rate of 7.5 and 4.0 parts/hr, respectively, and sources of fugitive emissions.
- (b) Two (2) gelcoat booths, identified as SB1E, and SB2W, constructed in 1998, using non-atomized gelcoat application, with a maximum production rate of 7.5 and 4.0 parts/hr, respectively, with emissions exhausted to stacks SV1E and SV2W, respectively.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to maintenance activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(c)]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2(c)]

- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Packaging lubricants and greases.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (f) Closed loop heating and cooling systems.
- (g) Heat exchanger cleaning and repair.
- (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Refractory storage not requiring air pollution control equipment.
- (k) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

### **Existing Approvals**

There are no existing approvals or permits for this source.

### **Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 11, 2001. Additional information was received on April 23, 2002.

A notice of completeness letter was not mailed to the source.

### **Emission Calculations**

See Appendix A, pages 1 through 2 of this document for detailed emissions calculations.

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	67.2
PM-10	67.2
SO <sub>2</sub>	-
VOC	134
CO	-
NO <sub>x</sub>	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	103
Methyl Methacrylate	16
TOTAL	119

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	-
PM-10	-
SO <sub>2</sub>	-
VOC	18.99
CO	-
NO <sub>x</sub>	-

hap	--
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## Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Limited Potential to Emit (tons per year)							
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC <sup>(a)</sup>	CO	NO <sub>x</sub>	HAPs <sup>(a)</sup>
Flowcoat Booth (FC1S)	Neg.*	Neg.*	-	less than 15.57	-	-	less than 15.57
Flowcoat Booth (FC2N)	Neg.*	Neg.*	-	less than 15.58	-	-	less than 15.58
Gelcoat Booth (SB1E)	33.67	33.67	-	less than 51.19	-	-	less than 43.95
Gelcoat Booth (SB2W)	33.49	33.49	-	less than 50.98	-	-	less than 43.72
Total Emissions	67.16	67.16	Neg.	less than 114.5	Neg.	Neg.	less than 100

\* The flowcoat booths use non-atomized resin application; therefore, PM emissions from these facilities are negligible.

Neg. - Negligible

(a) The limited potential to emit VOC and HAP from the flowcoat and gelcoat booths (on a per booth basis) is based on the respective maximum production rates, average styrene content of the resins and gels used, and *Unified Emission Factors for the Open Molding of Composites*. Pursuant to 326 IAC 2-4.1-1, the aggregate HAP emissions from the flowcoat and gelcoat booths (in aggregate) are limited to less than 100 tons per twelve consecutive month period. This limitation will restrict VOC emissions from the source to less than 114.5 tons per year (less than 100 tons VOC/HAP from resin/gel use + 14.5 tons VOC from maximum catalyst use).

## County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.



- (b) LaGrange County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source. 40 CFR Part 63 Subpart VVVV (National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing), promulgated August 22, 2001, does not apply to this source because the source is not a boat manufacturing facility as defined by 40 CFR 63.5683(b).
- (c) This source is not subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and, 3) the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal or greater than 100 percent of the amount required for a source to be classified as a major source. For this source, no units require the use of a control device to achieve compliance with the representative emission limitations. Therefore, 40 CFR Part 64 is not applicable to the source or any of the facilities contained therein.
- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002. This rule requires the source to:
  - (1) Submit a Part 1 MACT Application by May 15, 2002; and
  - (2) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.

The Permittee submitted a Part 1 MACT Application on May 15, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice is challenging the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. Therefore, the Part 2 MACT Application due date may be changed as a result of the suit.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source was constructed in 1998, is located in LaGrange County (attainment area for all pollutants), and the potential to emit of each criteria pollutant is, and was at initial construction, less than 250 tons per year (not 1 of 28 source categories). Therefore, pursuant to 326 IAC 2-2-2, this source is not subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **326 IAC 6-4 (Fugitive Dust Emissions)**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

Pursuant to 326 IAC 6-5-3(b), the source submitted a request to be exempted from this rule. H.R.O. Inc. generates an estimated 0.78 tons per year fugitive particulate matter from vehicular traffic. As a result, IDEM agrees that the source does not have to limit fugitive particulate matter emissions required pursuant to 326 IAC 6-5.

### **State Rule Applicability - Fiberglass Parts Manufacturing Operation**

#### **326 IAC 2-4.1 (New Source Toxics Control- Maximum Achievable Control Technology (MACT))**

The Flowcoat and Gelcoat Booths (FC1S, FC2N, SB1E and SB2W) have the potential to emit greater than 10 tons per year of a single HAP from the production of boat and cargo trailer components and were constructed after July 27, 1997. Therefore, pursuant to the MACT determination under 326 IAC 2-4.1, the Flowcoat and Gelcoat Booths (FC1S, FC2N, SB1E and SB2W) shall comply with the following operating conditions:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per twelve (12) consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:
  - (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.
  - (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (b) Resins and gel coats used shall be limited to the maximum HAP monomer contents listed in the following table, or their equivalent on an emissions mass basis, depending on the application method and products produced:

	HAP Monomer Content, Weight Percent
Resin, Manual or Mechanical Application of Fiber Reinforced Plastic Composites (non-watercraft)	
Production-Specialty Products	48*
Gel Coat Application of Fiber Reinforced Plastic Composites (non-watercraft)	
Production-Pigmented	37
Resin, Manual or Mechanical Application of Fiber Reinforced Plastic Composites (watercraft)	
Production-Specialty Products	48*
Gel Coat Application of Fiber Reinforced Plastic Composites (watercraft)	
Production-Pigmented	34

\* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified in the permit is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection (b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

$M_R$  = Total monthly mass of material within each category.

$E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.

$Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls.

*Units: mass = tons*

*emission factor = lbs of monomer per ton of resin or gel coat*

*emissions = lbs of monomer*

(c) The following categories of materials in subsection (b) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement technology, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (d) Unless specified in subsection (c), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).
- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).

- (e) The listed work practices shall be followed:

- (1) Cleaning operations for resin and gel coat application equipment:
  - (A) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment. To the extent possible the cleaning solvent used shall also be a non-VOC solvent.
  - (B) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
  - (C) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (2) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (3) Except for mixing containers as described in item (8), HAP and VOC containing materials shall be kept in a closed container when not in use.
- (4) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (5) Solvent collection containers shall be kept closed when not in use.
- (6) Clean-up rags with solvent shall be stored in closed containers.

- (7) Closed containers shall be used for the storage of the following:
  - (A) All production and tooling resins that contain HAPs.
  - (B) All production and tooling gel coats that contain HAPs.
  - (C) Waste resins and gel coats that contain HAPs.
  - (D) Cleaning materials, including waste cleaning materials.
  - (E) Other materials that contain HAPs.
- (8) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (f) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
  - (1) All personnel hired after the effective date of this rule shall be trained within fifteen (15) days of hiring.
  - (2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule.
  - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
  - (4) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (2) if written documentation that the employee's training is current is provided to the new employer.
  - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

- (1) Appropriate application techniques.
- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

#### 326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will

remain as the applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the fiberglass operations and shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the fiberglass operations shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### 326 IAC 8-1-6 (Volatile Organic Compounds)

The Gelcoat Booths (SB1E and SB2W) each have the potential to emit greater than 25 tons VOC per year and were constructed after January 1, 1980. The Flowcoat Booths (FC1S and FC2N) each have the potential to emit less than 25 tons VOC per year. Therefore, pursuant to 326 IAC 8-1-6, the Gelcoat Booths (SB1E and SB2W) are subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. BACT for this source shall be satisfied by the requirements of 326 IAC 2-4.1 (New Source Toxics Control- Maximum Available Control Technology).

No other Article 8 rules apply to the Flowcoat or Gelcoat Booths.

#### 326 IAC 20-25 (Emissions from Reinforced Plastics composites Fabricating Emission Units)

Pursuant to 326 IAC 20-25-3(f), this source is not subject to the requirements of the rule because the source is subject to 326 IAC 2-4.1.

### State Rule Applicability - Specifically Regulated Insignificant Activities

#### 326 IAC 6-3-2(e) (Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from the brazing soldering, welding, grinding, and machining operations shall not exceed 0.551 pounds per hour when operating at a process weight of less than one hundred (100) pounds per hour.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for

enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The following compliance monitoring conditions apply to the fiberglass operations (Flowcoat and Gelcoat Booths FC1S, FC2N, SB1E and SB2W):

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SV1E and SV2W while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance with these monitoring requirements are necessary to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

## **Conclusion**

The operation of this fiberglass parts manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T087-14534-00051.



January 31, 2003

**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the  
Technical Support Document for a Title V Part 70 Operating Permit**

Source Name: H.R.O., Inc.  
Source Location: 200 E. Vine Street, Wolcottville, Indiana 46795  
County: LaGrange  
SIC Code: 3732  
Operation Permit No.: T087-14534-00051  
Permit Reviewer: ERG/BS

On September 16, 2002, the Office of Air Quality (OAQ) had a notice published in the *LaGrange Standard* stating that H.R.O., Inc. had applied for a Title V Part 70 Operating Permit to operate a fiberglass manufacturing plant that produces boat and cargo trailer components. The notice also stated that the OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. The TSD incorrectly states that the source is not subject to 326 IAC 20-25 because it is subject to 326 IAC 2-4.1. Being subject to 326 IAC 2-4.1 only exempts the source from compliance with 326 IAC 20-25-3, not the entire rule. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. As a result, the following changes have only been made to the permit:

**D.1.1 New Source Toxics Control [326 IAC 2-4.1][326 IAC 20-25]**

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Pursuant to the MACT (Maximum Available Control Technology) determination under 326 IAC 2-4.1-1, **and in order to comply with the applicable requirements of 326 IAC 20-25**, operating conditions for the fiberglass operations (booths FC1S, FC2N, SB1E and SB2W) shall be the following:

- (a) Use of resins and gel coats shall be limited such that the potential to emit (PTE) volatile organic HAP from resins and gel coats only shall be less than 100 tons per twelve (12)

consecutive months with compliance determined at the end of each month. Compliance with this limit shall be determined based upon the following criteria:

2. In order to avoid confusion for renewal permits as to what “original” date to which IDEM is referring, the following change has been made:

**B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]**

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This permit is issued for a fixed term of five (5) years from the **original issuance date of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

3. Since B.7 (c) Duty to Supplement and Provide Information already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity:

**B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]**

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- (b) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~
- (c) **For information furnished by the Permittee to IDEM, OAQ,** ~~the Permittee may~~ include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

4. The following changes have been made because it is not necessary to state twice that the PMP does not need to be certified. Since it is more appropriate to state in (c), the language has been removed from (a):

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
 Compliance Branch, Office of Air Quality  
 100 North Senate Avenue, P. O. Box 6015  
 Indianapolis, Indiana 46206-6015

The ~~PMP and the~~ PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

5. The Emergency Provisions condition has been changed to include the correct rule citation and to document the move of the requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report from Condition B.12 to Condition B.15:

#### B.12 Emergency Provisions [326 IAC 2-7-16]

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- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(~~10~~ 9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) **Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- ~~———— (c) ——— Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

6. Condition B.13 (g) Permit Shield has been revised to correct the rule cite as follows:

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7 8)]

7. In order to be consistent with 326 IAC 2-7-20(a)(4) the rule cite in B.20(a)(5) has been revised as follows:

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

8. Condition B.21 was revised as follows:

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by **the requirements of** 326 IAC 2 and 326 IAC 2-7-10.5.

9. 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-7; therefore, this rule cite is being added to B.24. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4230** (ask for OAQ, ~~Technical Support and Modeling Section I/M & Billing Section~~), to determine the appropriate permit fee.
10. Condition C.1 has been updated to be consistent with the rule revision of 326 IAC 6-3-2.
- C.1 ~~Particulate-Matter~~ Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour **[40 CFR 52 Subpart P]**~~[326 IAC 6-3-2(e)]~~
- 
- (a) Pursuant to ~~326 IAC 6-3-2(e)~~ **40 CFR 52 Subpart P**, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) **Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.**
11. Condition C.8(e) has been revised to correct the rule citation.
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
- 
- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-~~41~~, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
12. The following was added to Condition C.10 to state what the OAQ does when stack testing, monitoring , or reporting is required to assure compliance with applicable requirements.

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11**. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

13. The Section D.2 facility descriptions have been revised to include the correct 326 IAC 6-3-2 rule citation.

**Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated Insignificant Activities**

- (a) The following equipment related to maintenance activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(e e)]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2(e e)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

14. Condition C.6 (Fugitive Particulate Matter Emission Limitations, 326 IAC 6-5) has been removed because it states that the source is not subject to the requirements of 326 IAC 6-5. This statement of fact is included in the TSD and does not belong in the permit.

~~C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]~~

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~~Pursuant to 326 IAC 6-5-3(b), the source submitted a request to be exempted from this rule. H.R.O. Inc. generates an estimated 0.78 tons per year fugitive particulate matter from vehicular traffic. As a result, IDEM agrees that the source does not have to limit fugitive particulate matter emissions required pursuant to 326 IAC 6-5.~~

**Appendix A: Emissions Calculations**  
**Reinforced Plastics and Composites: Fiberglass**  
**Open Molding Operations**  
**Resin and Gel Usage**

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**Company Name: H.R.O., Inc.**  
**Address City IN Zip: 200 E. Vine Street, Wolcottville, IN 46795**  
**Permit #: T087-14534-00051**  
**Reviewer: ERG/BS**  
**Date: December 4, 2001**

Emission Unit ID	Material in Resin or Gel	Density (Lb/Gal)	Weight % Monomer or VOC constituent *	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)	UEF (lbs monomer/ton resin or gel)	Potential VOC/HAP (pounds per day)	Potential VOC/HAP (tons per year)	Transfer Efficiency**	Potential PM (tons per year)
Gelcoat Booth SB1E	Stryene	10.7	31.27%	0.74	7.500	278	198.11	36.15	80%	33.67
	Methyl Methacrylate	10.7	4.00%	0.74	7.500	60	42.76	7.80		
Gelcoat Booth SB2W	Styrene	10.7	31.27%	1.38	4.000	278	197.04	35.96	80%	33.49
	Methyl Methacrylate	10.7	4.00%	1.38	4.000	60	42.53	7.76		
Flowcoat Booth FC1S	Styrene	9.2	33.00%	1.45	7.500	71	85.34	15.57	100%	0.00
										0.00
Flowcoat Booth FC2N	Styrene	9.2	33.00%	2.72	4.000	71	85.37	15.58	100%	0.00
<b>Total VOC/HAP and PM from Resin and Gel Use</b>								<b>118.83</b>		<b>67.16</b>

\* Open Molding Operations include the following: manual application, mechanical application, gel coat application, and filament application.

\*\* Eighty percent (80%) was selected for operations using Air-Assisted Airless guns, and one hundred percent (100%) for flowcoating operations.

" The maximum (worst case) weight percent monomer was used to determine VOC/HAP emissions

Emission Unit ID	Material in Resin or Gel	Density (Lb/Gal)	Weight % VOC	Gal of Mat. (gal/unit)	Maximum usage (unit/hour)		Potential VOC (pounds per day)***	Potential VOC (tons per year)***
Gelcoat Booth SB1E	Catalyst (VOC)	9.8	90.00%	0.025	7.5		39.69	7.24
Gelcoat Booth SB2W	Catalyst (VOC)	9.8	90.00%	0.047	4		39.80	7.26

**Total VOC from Catalyst Use 14.51**

Note that VOC emissions from release agents and cleanup solvents are not included because the source uses non-VOC containing agents and solvents

\*\*\* Assumes 100% of the VOC is emitted

# **METHODOLOGY**

Assume all of the monomer is styrene.

Emission factors are based on the type of application from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (April 1999) to calculate resin and gelcoat emissions.

Potential VOC (lb/day) for resins or gels = Density (lb material /gal material) \* Gal. of material (gal material/unit) \* Maximum usage (unit/hr) \* UEF (lb styrene/ton material) \* 24 hrs/day \* 1 ton material/2000 lbs material

Potential VOC (ton/year) = Potential VOC (lb/day) \* 365 days/year \* (1 ton/2000 lb)

Potential PM (ton/year) = Density \* (1 - Weight % monomer or VOC) \* Gal. of Material \* Maximum Usage \* (1 - transfer efficiency) \* 24 hrs/day \* 365 days/year \* (1 ton/2000 lb)

**Appendix A: Emissions Calculations**  
**Fugitive Emissions from Unpaved Roads**  
**Company Name: H.R.O., Inc.**  
**Address City IN Zip: 200 E. Vine Street, Wolcottville, IN 46795**  
**Permit #: T087-14534-00051**  
**Reviewer: ERG/BS**  
**Date: December 4, 2001**

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**Unpaved Roads**

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP42, Ch. 13.2.2 (Supplement E, 9/98)

$$\begin{aligned} &1.35 \text{ trip/hr} \times \\ &0.018939 \text{ mile/trip} \times \\ &2 \text{ (round trip)} \times \\ &8760 \text{ hr/yr} = \end{aligned} \quad 447.9452 \text{ miles per year}$$

**PM**

Method:  $E_f = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p) / 365]$   
= 3.48

where:

- k = 10 (particle size multiplier for PM-10) (k = 10 for PM-30 or TSP)
- s = 6.4 mean % silt content of unpaved roads
- b = 0.5 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
- c = 0.4 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
- W = 2.2 tons average vehicle weight
- Mdry = 0.2 surface material moisture content, %
- p = 120 no. of days with at least 0.254 mm of precipitation (see Fig/ 13.2.2-1)

$$3.48 \text{ lb/mi} * 447.9452 \text{ mi/yr} = \quad \mathbf{0.78 \text{ ton PM/yr}}$$

**PM10**

Method:  $E_f = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p) / 365]$   
= 0.93

where:

- k = 2.6 (particle size multiplier for PM-10) (k = 10 for PM-30 or TSP)
- s = 6.4 mean % silt content of unpaved roads
- b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)
- c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)
- W = 2.2 tons average vehicle weight
- Mdry = 0.2 surface material moisture content, %
- p = 120 no. of days with at least 0.254mm of precipitation (see Fig/ 13.2.2-1)

$$0.93 \text{ lb/mi} * 447.9452 \text{ mi/yr} = \quad \mathbf{0.21 \text{ ton PM10/yr}}$$